

UNITED STATES DISTRICT COURT

for the

Eastern District of California

**SEALED**

In the Matter of the Search of)
 The computer servers hosting four of Louis)
 MENDONSA's SUBJECT ACCOUNTS)
 operating on Tor network Websites A, B, C,)
 and D)

Case No.

2:22-sw-0871 AC

APPLICATION FOR A WARRANT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (*identify the person or describe the property to be searched and give its location*):

SEE ATTACHMENT A, attached hereto and incorporated by reference.

located in the Eastern District of California, there is now concealed (*identify the person or describe the property to be seized*):

SEE ATTACHMENT B, attached hereto and incorporated by reference

The basis for the search under Fed. R. Crim. P. 41(c) is (*check one or more*):

- evidence of a crime;
- contraband, fruits of crime, or other items illegally possessed;
- property designed for use, intended for use, or used in committing a crime;
- a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. §§ 2251, 2252	Advertisement, distribution, and receipt of child pornography

The application is based on these facts:

SEE AFFIDAVIT, attached hereto and incorporated by reference.

- Continued on the attached sheet.
- Delayed notice 30 days (give exact ending date if more than 30 days: _____) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

/s/ Caitlin Thomas

Applicant's signature

HSI Special Agent Caitlin Thomas

Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by
 telephone _____ (*specify reliable electronic means*).

Date: November 29, 2022

City and state: Sacramento, California

Allison Claire
ALLISON CLAIRE
UNITED STATES MAGISTRATE JUDGE

**AFFIDAVIT IN SUPPORT OF AN APPLICATION UNDER RULE 41
FOR A WARRANT TO SEARCH AND SEIZE**

I, Caitlin Thomas, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I make this affidavit in support of an application under Rule 41(b)(6)(A) of the Federal Rules of Criminal Procedure for a warrant to search four SUBJECT ACCOUNTS, further described below and in Attachment A, for the information described in Attachment B. As further set forth below, the SUBJECT ACCOUNTS are user accounts on websites dedicated to the advertisement and distribution of child pornography, and the locations of the websites' servers have been concealed through technological means.

2. I am a Special Agent ("SA") with Homeland Security Investigations ("HSI") and have been so employed since April 2019. I trained at the Federal Law Enforcement Training Center and have gained experience through everyday work conducting these types of investigations. I have received training in the areas of child sexual abuse material ("CSAM") and have observed and reviewed numerous examples of child pornography (as defined in 18 U.S.C. § 2256) in all forms of media including computer media. I am authorized to investigate violations of the laws of the United States, including criminal violations relating to the sexual exploitation of children, child pornography, coercion and enticement, and transportation of minors, including violations of 18 U.S.C. §§ 2422, 2423, 2251, and 2252A. I have participated in investigating federal criminal violations related to high technology or cybercrime, and CSAM. Additionally, I am a member of the Sacramento Valley Internet Crimes Against Children ("ICAC") Task Force. As an SA in the Sacramento Field Office and ICAC Task Force, I frequently participate in search warrant executions involving child exploitation and pornography cases. In June 2022, I attended the National Law Enforcement Training on Child Exploitation which offered classes ranging from investigative techniques and digital forensics. Moreover, I work closely with HSI forensic examiners throughout these investigations and prosecutions.

3. This affidavit is intended to show only that there is sufficient probable cause for the requested warrant and does not set forth all my knowledge about this matter. The statements contained in this affidavit are based in part on information provided by HSI Special Agents; written reports about this and other investigations that I have received, directly or indirectly, from other law enforcement agents; information gathered from the service of administrative subpoenas; orders issued pursuant to 18 U.S.C. § 2703(d); the results of physical and electronic surveillance conducted by law enforcement agents; independent investigation and analysis by HSI agents and analysts and computer forensic professionals employed by the Department of Justice; and my experience, training, and background as an HSI Special Agent.

4. The investigation, described more fully below, involves four websites, Websites A, B, C, and D,¹ that are dedicated to the advertising and distribution of child pornography and discussion of the sexual exploitation of minors. The investigation has revealed evidence that a particular target (referred to herein as the “SUBJECT USER”), acting under particular online aliases, was a registered and active member of Websites A, B, C, and D, which he used to advertise and distribute child pornography.

5. Based on my training and experience and the facts as set forth in this affidavit, there is probable cause to believe the SUBJECT USER controls accounts on Website A (“SUBJECT ACCOUNT 1”), Website B (“SUBJECT ACCOUNT 2”), Website C (“SUBJECT ACCOUNT 3”), and Website D (“SUBJECT ACCOUNT 4”); further described in Attachment A, and has violated 18 U.S.C. §§ 2251(d) and (e) (advertisement of child pornography), 2252(a) and (b) (distribution, transportation, receipt, possession, and access with intent to view child pornography), including attempts and conspiracies to commit these offenses. There is also

¹ The name of Websites A, B, C, and D, as well as the aliases of some users and other identifying information, are known to law enforcement but anonymized here to protect operational security.

probable cause to search the information described below and in Attachment A for evidence, instrumentalities, contraband, and fruits of these crimes as described in Attachment B.

IDENTIFICATION OF THE SUBJECT ACCOUNTS

6. This warrant authorizes the use of a remote search technique to be deployed on the computer servers hosting Websites A, B, C, and D, in an attempt to obtain information described in Attachment B from the account described below.

- a. The first computer server is the server operating the Tor network website, Website A, as identified by the following Tor URL:
<http://243vnzoix3ct6vowjgakv3pdqrzfnkoz5plwgta3ar2onqobzhz5jid.onion/>
 - i. The current location of this server is concealed through technological means.
 - ii. SUBJECT ACCOUNT 1—*i.e.*, the Website A account used by the SUBJECT USER—is described by the Website A username “JediFox.”
- b. The second computer server is the server operating the Tor network website, Website B, as identified by the following Tor URL:
<http://boysrusx2x57nrer4xll4ap6ityf5qskjzewhnz7s6qto3mjjegrteid.onion/>
 - i. The current location of this server is concealed through technological means.
 - ii. SUBJECT ACCOUNT 2—*i.e.*, the Website B account used by the SUBJECT USER—is described by the Website B username “Yoda.”
- c. The third computer server is the server operating the Tor network website, Website C, as identified by the following Tor URL:
<http://bv6x2v64lj7cxxwiuh5xvwikv7zwvpgq7dwei26p7v4xbaag5ewexad.onion/>

- i. The current location of this server is concealed through technological means.
 - ii. SUBJECT ACCOUNT 3—*i.e.*, the Website C account used by the SUBJECT USER—is described by the Website C username “Darth Vader.”
- d. The fourth computer server is the server operating the Tor network website Website D, as identified by the following Tor URL:
- <http://forbidn7733ri3ro6zp4tqm4wurhsj7cnhifjzkem25mi6qyimyfy6qd.onion>
- i. The current location of this server is concealed through technological means.
 - ii. SUBJECT ACCOUNT 4—*i.e.*, the Website D account used by the SUBJECT USER—is described by the Website D username “Gunslinger.”

BACKGROUND ON THE TOR NETWORK

7. The Internet is a global network of computers and other devices. Devices directly connected to the Internet are uniquely identified by IP addresses, which are used to route information between Internet-connected devices. Generally, when one device requests information from a second device, the requesting device specifies its own IP address so that the responding device knows where to send its response. On the Internet, data transferred between devices is split into discrete packets, each of which has two parts: a header with non-content routing and control information, such as the packet’s source and destination IP addresses; and a payload, which generally contains user data or the content of a communication.

8. Websites A, B, C, and D, further described below, operate on the Tor network, which is a computer network available to Internet users that is designed specifically to facilitate anonymous communication over the Internet. The Tor network attempts to do this by routing

Tor user communicates through a globally distributed network of intermediary computers, or relays, along a randomly assigned path known as a “circuit.” Because of the way the Tor network routes communications through the relay computers, traditional IP address-based identification techniques are not effective.

9. To access the Tor network, a user must install Tor software. That is most easily done by downloading the free “Tor browser” from the Tor Project, the nonprofit organization that maintains the Tor network, via their website at www.torproject.org. The Tor browser is a web browser that is configured to route a user’s Internet traffic through the Tor network.

10. As with other Internet communications, a Tor user’s communications are split into packets containing header information and a payload and are routed using IP addresses. For a Tor user’s communications to be routed through the Tor network, a Tor user necessarily (and voluntarily) shares the user’s IP address with Tor network relay computers, which are called “nodes.” The Tor user’s routing information, which includes the user’s destination and originating IP information, is stored in the header portion of the packet. As the packets travel through the Tor network, each node can see the address information of the previous node the communication came from and the next node the information should be sent to. Those Tor nodes are operated by volunteers – individuals or entities who have donated computers or computing power to the Tor network for it to operate.

11. Because a Tor user’s communications are routed through multiple nodes before reaching their destination, when a Tor user accesses an Internet website, only the IP address of the last relay computer (the “exit node”), as opposed to the Tor user’s actual IP address, appears on that website’s IP address log. In addition, the content of a Tor user’s communications are encrypted while the communication passes through the Tor network. That can prevent the operator of a Tor node from observing the content (but not the routing information) of other Tor

users' communications.

12. The Tor Network also enables users to operate websites, such as Websites A, B, C, and D called "hidden services" or "onion services," in a manner that attempts to conceal the true IP address of the computer hosting the website. Hidden service websites are accessible only to users operating within the Tor network. Like other websites, hidden services are hosted on computer servers that communicate through IP addresses. However, hidden services have unique technical features that attempt to conceal the computer server's location.

13. Unlike standard Internet websites, a Tor-based web address is comprised of a series of at least 16 and as many as 56 algorithm-generated characters, for example "asdlk8fs9dflku7f," followed by the suffix ".onion." Ordinarily, investigators can determine the IP address of the computer server hosting a website (such as www.justice.gov) by simply looking it up on a publicly available Domain Name System ("DNS") listing. Unlike ordinary Internet websites, however, there is no publicly available DNS listing through which one can query the IP address of a computer server that hosts a Tor hidden service. So, while law enforcement agents can often view and access hidden services that are facilitating illegal activity, they cannot determine the IP address of a Tor hidden service computer server via public lookups. Additionally, as with all Tor communications, communications between users' computers and a Tor hidden service webserver are routed through a series of intermediary computers. Accordingly, neither law enforcement nor hidden service users can use public lookups or ordinary investigative means to determine the true IP address – and therefore the location – of a computer server that hosts a hidden service.

14. Hidden service websites on the Tor Network are not "indexed" by search engines—such as Google—to anywhere near the same degree as websites that operate on the open Internet. Accordingly, it is much more difficult to perform a Google-type search of hidden

service websites than it is to search open Internet websites for particular content. Users interested in accessing child exploitation material (or in advertising child exploitation and pornography websites) therefore keep, maintain, and use directory sites that advertise the web addresses of hidden services that contain child exploitation related content. Users utilize those directory sites to identify new web forums, chat sites, image galleries, and file hosts pertaining to the sexual exploitation of children.

15. Based on my training, experience, and information provided to me by other law enforcement officers, I know that users of online child pornography websites on the Tor network value their online aliases and personas as a source of bona fides within their communities. A user may attain greater status within a community of like-minded offenders over a course of time via active participation in that community under a particular alias. That participation may amount to the trafficking of child pornography, moderation of sites, advice to users regarding safety and security, or other actions. It is therefore common for a user of one child pornography website on the Tor network to notify users of their aliases on different sites, to maintain a sort of accrued status on other sites. In fact, as described below, postings made by the SUBJECT USER on various child pornography websites on the Tor network indicate that the same user utilized multiple unique usernames across many such sites. The SUBJECT USER is believed to be the same individual operating on Websites A, B, C, and D utilizing different aliases.

LAW ENFORCEMENT DETERMINED THAT THE SUBJECT USER IS USING FOUR SUBJECT ACCOUNTS ACROSS WEBSITES A, B, C, and D

A. Investigation of Website A

16. Website A is a child pornography bulletin board that facilitates the advertisement and distribution of child pornography. Since around or about January 2021, Website A has been in operation. As part of the investigation into Website A, law enforcement agents viewed, examined, and documented the contents of Website A, including in an undercover capacity. Law

enforcement agents accessed Website A through the Tor URL
<http://243vnzoix3ct6vowjgakovpdqrzfnkoz5plwgta3ar2onqobzhz5jid.onion/> and documented the URL for purposes of this investigation.

17. To access postings on Website A, users are required to register a free account on the “[Website A]-Registration” page. The Registration page contains data-entry fields with the corresponding text, “Username, Password, Confirm Password, Email address, Language, My timezone.” Without an actively registered member account, visitor’s access to postings on Website A is restricted to the “Forum Rules” post, posted November 19, 2021. Excerpts from the “Forum Rules” include:

- *“Permitted age range for posts is 0 to 17, subject to caveats below.*
- *Banned pictures and video subjects include hurtcore*, drugged children, child is protesting (non-consensual), bullying, blackmailing & self-mutilation. Zoophilia is permitted only for 4 years old and older; the child must be "OK" with it and not be in distress.*

** Hurtcore is defined as:*

- *Anal or Vaginal penetration involving children 3 years old or younger.*
- *Any penetration causing pain regardless of age.*
- *Spanking, whipping etc. causing damage or pain*

18. After successfully registering and logging into Website A, a user can access any number of sections, forums, and sub-forums. Some of the sections and forums available to users include: “Rules,” “Discussion,” “Girls (Original Topics),” “Boys,” and “Board Information.” Additional accessible sub-forums include: “Chat,” “Requests,” “Hardcore,” “Fetishes,” “Voyeur,” “Webcam/Selfie,” “Studios,” and “Tech Support.” Some of the sub-forums, such as

“Hardcore,” contain the further selectable categories “Pedo (0-10 years old)” and “Hebe/Ephe (11-17 years old).”

19. In addition to forums and sub-forums containing posts, Website A includes a “the Team” page, listing trusted ranked members of Website A who administer, moderate, and contribute to the operation and continuity of the Forum. The ranked member categories listed on “the Team” page for Website A include “Administrators,” “Senior Moderator,” “Global Moderators,” “Moderators,” “Emeritus Administrators,” and “Emeritus Moderators.” During its investigation into Website A, law enforcement documented “the Teams” web page where SUBJECT USERNAME 1 is listed as a current “Administrator” of Website A.

20. Forum websites that require member registration, such as Website A, maintain member profile pages for each user. Member profile pages are generally viewable by all registered members of the website and contain user information including number of contributed posts, date the member joined the website, user rank (if any), member greeting signature, and the member’s avatar image.

21. On November 25, 2022, I reviewed Website A, particularly the page titled, “the team,” where SUBJECT USERNAME 1 is listed as one of the administrators. Upon clicking on the hyperlink for SUBJECT USERNAME 1, I was redirected to SUBJECT USERNAME 1’s member profile page. This profile lists SUBJECT USERNAME 1’s avatar image, website join date, number of contributed posts, last active date, and public PGP encryption key. Underneath the displayed public PGP encryption key² is the “User Statistics” in which I saw a website join

² “PGP” is also known as Pretty Good Privacy. PGP is a security program used to decrypt and encrypt messages through digital signatures and file encryptions. PGP works through a combination of cryptography, data compression, and hashing techniques. PGP uses the public key system in which every user has a unique encryption key that is known publicly in addition to a private key that only that specific user knows unless it is shared. A message is encrypted when

date of December 25, 2021, a last active date of November 25, 2022, and a “Total posts” count of more than 650.

22. Here are a few examples of SUBJECT USERNAME 1’s posts on Website A:

a. On July 8, 2022, at 12:44 PM UTC, SUBJECT USERNAME 1 posted an image under the topic “Girls Arcade – Chat and Share!” This post was captured by Law Enforcement on September 15, 2022. At that time, this post received 201 replies and 58,463 views. The image depicts what appears to be a prepubescent Caucasian female with dirty blonde hair wearing a pink dress with Winnie the Pooh embroidered on the front. The female is sitting on what appears to be a bed with a grayish green coloring and floral print; one leg is extended out while the other leg is bent bringing the foot inwards towards the opposite thigh. The female appears to be very small in stature in proportion to the bed she is sitting on and appears to have childlike facial features. The female’s pink dress has been pulled up exposing her bare vagina and the female has no visible pubic hair. Additionally, there does not appear to be any visible body hair on the female.

a user sends it to someone using the recipients public key. The message is then decrypted when the recipient opens it with their private key.

The most common reason for PGP encryption use is to enable people to confidentially send messages and data to each other using a combination of their public and private keys. PGP is also used to authenticate messages and for integrity checking purposes. PGP creates a digital signature for private and public keys in order to prove that a sender is the rightful owner of the message. However, PGP can also be used to confirm that a message reaches the intended recipient.

b. On August 9, 2022, at 10:55 AM UTC, SUBJECT USERNAME 1 posted an image under the topic “Girls Butts.” This post was captured by law enforcement on September 15, 2022. At that time, this post received 378 replies and 149,060 views. The image depicts what appears to be a prepubescent female with colorful leggings and baby blue underwear pulled down to her knees. The female has the crown of her head placed on the bed, her buttocks lifted upwards in the air, and she is bracing herself with her arms. The female’s anus and vagina are exposed to the camera. The female has no visible pubic hair or body hair, and the female’s hip development is consistent with that of a child. Additionally, the female appears to be small in stature in proportion to the objects around her.

c. On August 9, 2022, at 11:02 AM UTC, SUBJECT USERNAME 1 posted two images under the topic “Sucker Girls.” These posts were captured by law enforcement on September 15, 2022. At that time, these posts received 63 replies and 30,795 views. A description of the images are as follows:

i. The first image depicts what appears to be a Caucasian minor female with dark brown hair and wearing a purple shirt. There is an adult male laying down on pink bed sheets with a possible floral print. The male is wearing patterned navy underwear with a label reading, “COTTONWORLD.” The adult male has his underwear pulled slightly to the side and his erect uncircumcised penis and testicles pulled out. It appears that the foreskin has been slightly pulled back exposing part of the tip of the penis as the female orally copulates the male. The male has visible pubic hair as well as significant amount of body hair on his upper legs. The female appears to be a minor as she has a youthful looking face

in terms of supple skin and the female's head appears to be smaller and consistent with the size of a child's head in comparison to the male's body parts.

ii. The second image depicts what appears to be a nude prepubescent Caucasian female with brown hair. The female is kneeling on beige carpet next to what appears to be a bed with green, blue, red, and white plaid bedding and bed skirt. A heavy set, nude adult Caucasian male is standing in front of the female. The adult male has a significant amount of body hair visible on his legs and stomach in addition to pubic hair. The adult male's erect penis is penetrating the female's mouth. The female appears to be prepubescent as she no breast development and her body in comparison to the adult's body is the size of a prepubescent child.

d. On August 9, 2022, at 11:19 AM UTC, SUBJECT USERNAME 1 posted an image under the topic entitled, "The Forum Arcade." This post was captured by law enforcement on September 15, 2022. At that time, this post received 373 replies and 57,335 views. The image depicts what appears to be two pubescent females who are nude, one standing on each side of a pubescent male who is also nude. They are standing in what appears to be a pond of water up to their knees. The females have little breast development and slightly visible pubic hair can be seen on the minor female on the left. There is very minimal hip development of the females. There is pubic hair visible on the minor male; however, the male has no visible chest or arm muscle development. Both females and the male have facial features that are consistent with a minor.

e. On August 12, 2022, at 3:05 PM UTC, SUBJECT USERNAME 1 posted an image under the topic “Sucker Girls.” This post was captured by law enforcement on September 15, 2022. At that time, this post received 63 replies and 30,794 views. The image is a close-up image of an erect penis of an adult male sticking out of what appears to be the zipper opening of blue jeans. The tip of the penis is placed into the mouth of what appears to be a Caucasian minor female with dirty blonde hair. The female is holding the shaft of the penis directly below her mouth. The female’s hands appear to be small and childlike and the female’s face structure is very small and childlike in comparison to the male’s penis and legs.

B. Investigation of Website B

23. Website B is a child pornography bulletin board that facilitates the advertisement and distribution of child pornography. Website B determined that it began operating in or about April 2022. As part of the investigation into Website B, law enforcement agents viewed, examined, and documented the contents of Website B, including in an undercover capacity. Law enforcement agents accessed Website B through the Tor URL <http://boysrusx2x57nrer4xll4ap6ityf5qskjzewhnz7s6qto3mjzegreteid.onion/> and documented the URL for purposes of this investigation.

24. Similarly to Website A, visitors of Website B are required to register a free user account in order to access the Forum’s topics, discussions, posts, and sub-forums. After successfully registering and logging into the website, a user can access any number of sections, forums, and sub-forums. Some of the sections, forums, and sub-forums available to users include: “Rules,” “Discussion,” “Information,” “Boy Videos,” and “Boy Photos.” Posts on Website B are organized as topic threads that can contain singular or multiple posts within. For

example, under the “Boy Videos” - “Hard” sub-forum, there were more than 200 topics, with titles such as “Syrian Boys Fuck and Suck,” “Beautiful 12yo happily fucked by man,” “cum in mouth videos – large amount,” “10yo sucks again,” and “Sleeping Boys Megathread (+125 videos).” Based on my training and experience, I know that “yo” refers to “years old.”

25. Specially ranked members who contribute to the operation of Website B are listed on “the Team” page. The ranked member categories listed on “the Team” page for Website B include “Administrators,” “Co-Admin,” “Global Moderators,” and “Moderators.” On “the Team” page, SUBJECT USERNAME 2 is listed as a current Administrator of Website B.

26. On November 25, 2022, I reviewed Website B and its “the Team” page, where SUBJECT USERNAME 2 is listed as an administrator. Upon clicking on the hyperlink for SUBJECT USERNAME 2, I was redirected to SUBJECT USERNAME 2’s member profile page. This profile page lists SUBJECT USERNAME 2’s avatar image, website join date, number of contributed posts, last active date, and public PGP encryption key. Underneath the displayed public PGP encryption key is the “User Statistics” in which I saw a website join date of April 10, 2022, a last active date of November 24, 2022, and a “Total posts” count exceeding 500.

27. Next to the total topics is a hyperlink to search the user’s topics. SUBJECT USERNAME 2 is associated with the following topic threads: “The Toy Factory,” “[Website C],” “Artistic Photos,” “TopicLinks 2.2,” “Admit One Chat,” “Sk8er Boys,” “Freckles!,” “Wigglers in B/W,” “Boys Sleeping,” “Profile Flair,” “Artistic Beauty of Wiggles,” “Loli Club Chat,” “Boys Club Chat,” “[Website B] Banner Contest,” “Username Color Change” “[Website B] Themes,” “The Levels of [Website B],” and “Board Rules.”

28. Here are some examples of SUBJECT USERNAME 2’s posts on Website B:

a. On November 11, 2022, at 6:37 PM UTC, SUBJECT USERNAME 2 posted an image under the topic “Boys in B/W” in the forum, “Themed Photo Topics.” This post was captured by law enforcement on November 25, 2022. At that time, this post received 13 replies and 9,117 views. The image is black and white photo of what appears to be a prepubescent male who is nude and laying on his back. The male’s right knee is bent with his right foot placed on the floor. The male’s left leg is opened outwards and slightly bent at the knee. The male’s right hand is placed at the base of his flaccid uncircumcised penis. There is no visible pubic hair or body hair on the male. Additionally, the male lacks chest development. The male’s face is also visible and appears to have childlike facial features to include supple skin. Additionally, the size of the male’s penis in comparison to the size of his body is consistent with that of a prepubescent minor.

b. On November 11, 2022, at 12:04 AM UTC, SUBJECT USERNAME 2 posted an image under the topic “Group Photos of 4+ or more Boys N/NN” in the forum, “Themed Photo Topics.” This post was captured by law enforcement on November 25, 2022. At that time, this post received 18 replies and 4,995 views. The image depicts what appear to be four Caucasian prepubescent males. Two of the males, who are nude, with dark brown hair are laying on their backs with their arms bent and placed behind their heads. They appear to be laying on bare twin mattresses with no covers. The third male, who is nude with light brown hair, is on his hands and knees and is orally copulating one of the males laying on their back. The fourth male, with red hair, is orally copulating the second male who is laying on his back. Due to how the photo was

taken, the body of the fourth male is not visible. There is no visible pubic hair, body hair, or facial hair on the three males that are visible in the photo. Additionally, there is a lack of chest and arm muscle development in the three male's bodies that are visible in the photo. There is no visible facial hair on the fourth male. Based upon the size of the males depicted in comparison to the twin size mattresses, the males appear childlike in stature.

c. On November 11, 2022, at 12:01 AM UTC, SUBJECT USERNAME 2 posted an image under the topic "Boys Fellating Men" in the forum, "Themed Photo Topics." This post was captured by law enforcement on November 25, 2022. At that time, this post received 129 replies and 34,720 views. The image is a colored image that depicts what appears to an adult male laying on a bed with a dark colored quilt and colorful floral print design. The male's legs are spread open. There is visible body hair on the chest, stomach, arms, armpits, and legs of the adult male. Based upon the fairness of the skin, the adult male appears to be Caucasian. Between the legs of the adult male, is what appears to be a minor male, due to the significantly smaller stature in comparison to the adult male, with light brown hair. This male is laying on his stomach and propped up slightly on his elbows. The adult's erect penis is placed in the mouth of the male. There does not appear to be visible body or facial hair on the male laying on his stomach.

29. Website B contains images uploaded by other users in which SUBJECT USERNAME 2 has access to as a member and administrator of Website B. The following is an example of a posting made by another user on Website B: on July 25, 2022, at 2:35 PM UTC, another user posted an image under the topic entitled, "Masturbating Boys." This post was

captured by law enforcement on November 27, 2022. The image depicts a close-up photo of a toddler's penis. An adult male hand is gripping the shaft of the toddler's penis; the male has an olive, tan skin tone. The male's hand is significantly larger in comparison to the toddler's thigh and abdomen. Furthermore, it appears that there is a substance on and around the toddler's penis as the skin appears shiny and wet unlike the abdomen and thighs.

C. Investigation of Website C

30. Website C is a membership-based, child-pornography hidden service on the Tor network dedicated to the advertisement and distribution of child pornography and the discussion of matters pertinent to the sexual abuse of children. Like Websites A and B, Website C is currently operational on the Tor network. Website C's users actively post content depicting minors engaged in sexually explicit conduct and engage in online discussions involving the sexual exploitation of minors. Law enforcement's investigation of Website C determined that it began operating in or about November 2021. As part of the investigation into Website C, law enforcement agents viewed, examined, and documented the contents of Website C, including in an undercover capacity. Law enforcement agents accessed Website C through the Tor URL <http://bv6x2v64lqj7cxxwiuh5xvwikv7zwvpgq7dwei26p7v4xbaag5ewexad.onion/> and documented the URL for purposes of this investigation.

31. After navigating to Website C, users are taken to a page identifying the site by name and instructing the users to complete a CAPTCHA, which is a challenge-response test used to determine whether the user attempting to visit the website is human. On or about November 25, 2022, the CAPTCHA required for entry to Website C asked users to "Click on the broken circle to solve the captcha." Directly below those instructions was an image of what appeared to be two nude prepubescent boys laying on a bed with their penises exposed. Superimposed on this image were a series of circles, one of which was "broken" or not fully formed or connected.

32. Clicking the “broken” circle took the user to a login page for Website C, which requires users to enter a username and password to access the website. On or about November 25, 2022, a banner at the top of this page identified the name of Website C and depicted what appeared to be a nude prepubescent boy laying down, with a leaf covering his genitals. After logging into Website C, users are presented with various forums, including a forum entitled, “Videos” that contained numerous sub-forums. The sub-forums included “Movies,” “Non-Nude,” “Softcore,” “Hardcore,” “Preschool,” and “Toddlers.” These sub-forums contained descriptions; for example, the “Toddlers” forum description is “Boys until 3 years old.” The description for the “Preschool” forum is “Boys from 3 to 5 years.” Website C also contained a forum entitled, “Other” which included sub-forums entitled, “Beginners Guide,” “Tech Forum,” and “News and Current Information.”

33. Specially ranked members who contribute to the operation of Website C are listed on “the Team” page. The ranked member categories listed on “The team” page for Website C include “Administrators,” “Co-Administrator,” “Senior Moderator,” Global Moderators,” “Forum Moderators,” “Reup Doctor Chief of Staff,” and “Reup Doctors.”

34. On November 25, 2022, I reviewed Website C, particularly “the Team” page, where SUBJECT USERNAME 3 is listed as one of the Global Moderators. Upon clicking the hyperlink for SUBJECT USERNAME 3, I was redirected to SUBJECT USERNAME 3’s member profile page. This profile page depicts SUBJECT USERNAME 3’s avatar image, website join date, number of contributed posts, last active date, and public PGP encryption key. Underneath the displayed public PGP encryption key is the “User Statistics” in which I observed a website join date of January 22, 2022, a last active date of November 25, 2022, an “AoA” of 10-14, and a “Total posts” count of more than 1,600. I know from my training and experience that the abbreviation “AoA” on CSAM websites refers to “age of attraction.”

35. On November 25, 2022, at 4:26 PM UTC, SUBJECT USERNAME 3 posted an image under the topic “Little ones nude [Theme]” in the forum, “Preschool.” This post was captured by law enforcement on November 25, 2022. At that time, this post received 1,004 replies and 152,367 views. The colored image depicts what appears to be a prepubescent male who is nude with blonde hair. The male is laying on a bed with his arms out to his side and his right leg crossed over his left leg. The male’s uncircumcised, flaccid penis is visible. The male has no visible pubic, body, or facial hair. The male lacks chest and arm muscle development. The male’s facial features are childlike and the size of the male’s body in comparison to the size of the bed also shows that the male’s body is consistent with that of a child.

36. Website C contains images uploaded by other users in which SUBJECT USERNAME 3 has access to as a member and administrator of Website C. on November 5, 2022, at 10:27 PM UTC, another user posted an image under the topic entitled, “Black and White Photos,” for which SUBJECT USERNAME 3 “thanked” the user who posted the photo. A “thank” on Website C is similar to “liking” a post on social media. This post was captured by law enforcement on November 27, 2022. The image is a black and white photo depicting what appears to be a prepubescent male who is nude laying on his back on what appears to be a couch. The male has his knees bent to his chest and feet raised towards the ceiling exposing the male’s genitals. There is a lack of visible pubic hair, body hair, and facial hair. The male appears to have childlike facial features to include larger eyes and a smaller nose and mouth. There is an adult male holding the minor’s leg and inserting his erect penis into the anus of the minor. This adult male has significant body hair on his legs, arms, chest, and abdomen.

D. Investigation of Website D

37. Website D is a membership-based, child-pornography hidden service on the Tor network dedicated to the advertisement and distribution of child pornography and the discussion

of matters pertinent to the sexual abuse of children. Like Websites A, B, and C; Website D is currently operational on the Tor network. Website D users actively post content depicting minors engaged in sexually explicit conduct and engage in online discussions involving the sexual exploitation of minors. Law enforcement's investigation of Website D determined that it began operating in or about February 2022. As part of the investigation into Website D, law enforcement agents viewed, examined, and documented the contents of Website D, including in an undercover capacity. Law enforcement agents accessed Website D through the Tor URL <http://forbidn7733ri3ro6zp4tqm4wurhsj7cnhifjzkem25mi6qyimyfy6qd.onion/> and documented the URL for purposes of this investigation.

38. After navigating to Website D, users are taken to a page identifying the site by name and instructing the users to complete a CAPTCHA, which is a challenge-response test used to determine whether the user attempting to visit the website is human. On or about November 25, 2022, the CAPTCHA required for entry to Website D asked users to "Click on the broken circle to solve the captcha." Directly below those instructions was an image of what appeared to be two nude, prepubescent girls laying together on a flat surface, with one girl spreading her legs and exposing her vagina. Superimposed on this image were a series of circles, one of which was "broken," or not fully formed.

39. Clicking the "broken" circle took the user to a login page for Website D, which requires users to enter a username and password to access the website. On or about November 25, 2022, a banner at the top of this page identified the name of Website D. After logging into Website D, users are presented with various forums, including a forum entitled, "Fruit" that contained numerous sub-forums. These sub-forums included "Non-Nude," "Softcore," "Hardcore," and "Webcams." These sub-forums contained instructions that the posted content should depict "4-12yo girls only." Other sub-forums in the "Fruit" forum contained similar

instructions regarding the age of the minors that should be depicted in the posted content, including a sub-form titled “Young Teens,” which was for “[c]ontent involving 13-17yo girls,” and a sub-forum titled “Babies & Toddlers,” which was for “[c]ontent involving 0-3yo girls.” Website D also contained a forum entitled, “Community,” which included sub-forums entitled, “Announcements & Information,” “English Chat,” and “Guides & Tutorials.”

40. Specially ranked members who contribute to the operation of Website D are listed on “the Team” page. The ranked member categories listed on “the Team” page for Website D include, “Administrators,” “Global Moderators,” and “Fruit & Studios Moderators,” “Stories Moderators,” “Russian Moderators,” “Indonesian Moderators,” “Japanese Moderators,” and “French Moderators.” According to the “the Team” page, SUBJECT USERNAME 4 is listed as a current Global Moderator of Website D.

41. On November 25, 2022, I reviewed Website D, particularly the page titled, “the Team,” where SUBJECT USERNAME 4 is listed as one of the Global Moderators. Upon clicking on the hyperlink on SUBJECT USERNAME 4, I was redirected to a member profile page which listed the SUBJECT USERNAME 4’s avatar image, website join date, number of contributed posts, last active date, and public PGP encryption key. Underneath the displayed public PGP encryption key is the “User Statistics” in which I observed a website join date of February 21, 2022, a last active date of November 25, 2022, and a “Total posts” count of more than 1,100.

42. Next to the total topics statistics, is a hyperlink to search and display the topics threads created by SUBJECT USERNAME 4. After clicking the hyperlink I observed the following topic thread titled: “Girls with Animals (NO BEASTIALITY!),” “Artistic Photography,” “Black & White Photography,” “Sweet Feet,” “Ice cream girls,” “[images] Girls in an indoor pool setting,” and “[Website B] – New Boy Board.”

43. The following are examples of postings made by SUBJECT USERNAME 4 on Website D:

a. On November 23, 2022, at 3:54 PM UTC, SUBJECT USERNAME 4 posted an image to the topic entitled, “Latest Cum Target [THEME],” on the forum entitled, “Themed Images.” This post was captured by law enforcement on November 25, 2022. At that time, this post received 890 replies and 501,798 views. The image is a colored image of what appears to be a prepubescent female who is laying on her back on the floor while nude. The female has blonde hair and what appears to be a blue bow in her hair. The female has no visible pubic hair and has chest and hip development that is consistent with a prepubescent child.

b. On November 19, 2022, at 5:29 PM UTC, SUBJECT USERNAME 4 posted an image to the topic entitled, “Girls Butt Mega Thread,” on the forum entitled, “Themed Images.” This post was captured by law enforcement on November 25, 2022. At that time, this post received 893 replies and 448,246 views. The image is a colored image of what appears to be a minor female who is laying on her stomach, propped up slightly on her elbows, and looking back at the camera while nude. The female’s legs are spread apart and bent at the knees exposing her buttocks and pubic area. Based upon the female’s facial features, lack of body hair and pubic hair, and the small stature of the female, it appears the female is prepubescent.

c. On November 13, 2022, at 5:37 PM UTC, SUBJECT USERNAME 4 posted an image to the topic entitled, “Tween/hebe girls (Open Thread!),” on the forum entitled, “Themed Images.” This post was captured by

law enforcement on November 25, 2022. At that time, this post received 231 replies and 127,162 views. The image is a colored image of what appears to be a pubescent female with light brown hair who is sitting and leaning slightly backwards while nude. The female's legs are spread, and her hands are wrapped around her legs to spread the labia of her vagina exposing the vaginal opening. The female has no visible pubic or body hair; however, she does have slight breast development. Typed within the post above the image is the following: "An 11 Pic. [hyperlinked] Pedobum Album if you want more."

44. Website D contains images uploaded by other users in which SUBJECT USERNAME 4 has access to as a member and administrator of Website D. The following is an example of a posting made by another user on Website D that SUBJECT USERNAME 4 had access to: on September 11, 2022, at 4:20 AM UTC, a user posted an image under the topic entitled, "Black and White Photos" in which SUBJECT USERNAME 4 "thanked" the user on the site. This post was captured by law enforcement on November 27, 2022. The image is a black and white image of what appears to be a prepubescent female. The female is sitting on her buttocks with her knees bent, pulled towards her chest, and spread outwards. The female's pubic area is exposed to the camera. There is no visible body hair or pubic hair. The female has no breast development.

LAW ENFORCEMENT IDENTIFIED MENDONSA AS THE SUBJECT USER

45. Through this investigation, law enforcement reviewed multiple posts made by SUBJECT USERNAMES 1, 2, 3, and 4 where the user addresses his ownership of the separate SUBJECT USERNAME alias', linking his identity across Websites A, B, C, and D. As noted above in this affidavit, this is common for users on the dark web so that they can prove their

credibility and display their duration of operation on the dark web. Below are a few examples of such posts.

46. On February 27, 2022, SUBJECT USERNAME 4 made the following post on Website D, voicing ownership of SUBJECT USERNAME 1 and SUBJECT USERNAME 2:



"Nice to meet all of you! If any of you like boys you might know me from [another Tor website known to law enforcement] and [another Tor website known to law enforcement] as PREVIOUS SUBJECT USERNAME³, from [another Tor website known to law enforcement] as SUBJECT USERNAME 1, and currently Website B as SUBJECT USERNAME 2 . . . Now I'm SUBJECT USERNAME 4 . . . "

³ The name of the PREVIOUS SUBJECT USERNAME is known to law enforcement. Investigation into the websites in which the SUBJECT USER is active on remains ongoing and disclosure of the name of this PREVIOUS SUBJECT USERNAME would potentially alert active website users to the investigation, potentially provoking users to notify other users of law enforcement action, flee, and/or destroy evidence.

47. On February 14, 2022, SUBJECT USERNAME 3 made the following post on another Tor hidden service website known to law enforcement which is dedicated to the sexual exploitation and abuse of children, that he was the same user as SUBJECT USERNAME 1, and a PREVIOUS SUBJECT USERNAME utilized on a dark web site that has since been taken down by law enforcement. Additionally, SUBJECT USERNAME 3 mentions his association with Websites A and B.

Re: PGP public keys
□ by [REDACTED] Feb 14, 2022 3:47 pm

CODE: SELECT ALL

```
-----BEGIN PGP SIGNED MESSAGE-----
Hash: SHA256

Greetings to all at [REDACTED]!
It is I, [REDACTED] aka [REDACTED] aka [REDACTED]
You can find my public key in the link
In my signature, or at [REDACTED], [REDACTED], etc.
It is Valentine's Day so have a happy one! :)
-----BEGIN PGP SIGNATURE-----
```

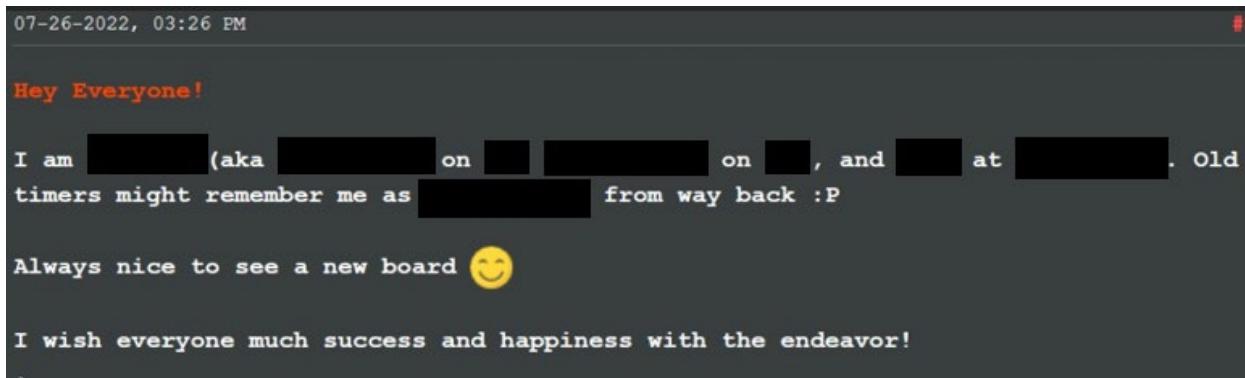
“Greetings to all at [known website]! It is I, [SUBJECT USERNAME 1] aka [SUBJECT USERNAME 3] aka [PREVIOUS SUBJECT USERNAME]. You can find my public key in the link in my signature, or at [Website B], [Website A], etc. . . .”

SUBJECT USERNAME 1’s signature on this known site includes his username in a block font, a logo or mascot that appears to be associated with SUBJECT USERNAME 1, and the following reference:

Admin @ [REDACTED] / * GMod @ [REDACTED] / [REDACTED]

“Admin @ Website A / Website B * GMod @ Website C / Website D”

48. Additional investigation revealed that an individual with this PREVIOUS SUBJECT USERNAME was an active member of other child sexual abuse material websites on the Tor network, and the same individual likely operated and continues to operate accounts and administer child sexual abuse websites under multiple claimed aliases. Law enforcement believes this to be true based upon the following post on a known child sexual abuse website on the Tor network:



07-26-2022, 03:26 PM #1

Hey Everyone!

I am [REDACTED] (aka [REDACTED] on [REDACTED] on [REDACTED], and [REDACTED] at [REDACTED]. Old timers might remember me as [REDACTED] from way back :p

Always nice to see a new board 😊

I wish everyone much success and happiness with the endeavor!

“I am [SUBJECT USERNAME 1] (aka [SUBJECT USERNAME 4] on [WEBSITE D], [SUBJECT USERNAME 3] on [WEBSITE C], and [SUBJECT USERNAME 2] at [WEBSITE B]. Older timers might remember me as [PREVIOUS SUBJECT USERNAME] from way back”

49. To identify the user who was operating the PREVIOUS SUBJECT USERNAME that is linked to SUBJECT USERNAMES 1, 2, 3, and 4; law enforcement, with assistance from analysts, conducted a search through historical user data associated with websites dedicated to the sexual exploitation of minors that were previously operational on the Tor network. The United States Department of Justice Child Exploitation & Obscenity Section (“CEOS”) has been investigating users of a historical membership-based hidden service on the Tor network which operated in 2018. This was a Tor hidden service website dedicated to CSAM. Many of the users

on the Tor hidden service website posted images of CSAM, requested images of CSAM, and encouraged members of the website to produce and upload images and videos of CSAM. In March 2019, HSI SAs obtained a federal warrant to search the contents of this hidden service. After obtaining the search warrant, Fresno HSI provided a copy of the site's contents to CEOS for additional analysis. Included in the contents of the site was user registration information such as usernames, login passwords, registration dates, and number of posts. The investigation of this website identified an individual accessing the website under a moniker that the SUBJECT USER is still referencing in posts present day; therefore, in effort to protect the integrity of this ongoing investigation, this username is referred to as PREVIOUS SUBJECT USERNAME. Among the information provided was the PREVIOUS SUBJECT USERNAME's password, which was associated with a specific professional baseball team in the United States.

50. To identify the user who was operating the PREVIOUS SUBJECT USERNAME, law enforcement conducted public search engine queries for social media accounts associated with the PREVIOUS SUBJECT USERNAME. The search revealed an Instagram⁴ account with an account username that was identical to that of the PREVIOUS SUBJECT USERNAME. The profile image associated with the Instagram account depicted a baseball with the name of the same professional baseball team written across the baseball as that of the password for the PREVIOUS SUBJECT USERNAME account on the hidden service that operated in 2018.

51. On or about September 22, 2022, United States Magistrate Judge Richard A. Lloret, Eastern District of Pennsylvania, issued an order pursuant to 18 U.S.C. § 2703(d) to Instagram for information associated with the account of PREVIOUS SUBJECT USERNAME

⁴ Instagram is an American photo and video sharing social networking service founded in 2010, and later acquired by Meta Platforms Inc.

with a vanity name of Louis Goodrich. On or about October 14, 2022, Instagram provided the following information regarding the following Instagram account:

Username: [PREVIOUS SUBJECT USERNAME] (hereinafter referred to “Instagram Account A”)

Registered Email: [PREVIOUS SUBJECT USERNAME]@gmail.com

Registration Date: 2016-05-14 03:43:51 UTC

52. Following the identification of this Instagram account, additional public search engine queries were conducted for the PREVIOUS SUBJECT USERNAME. An account was identified with a username of PREVIOUS SUBJECT USERNAME. The profile photo associated with the account was of a baseball with the same professional baseball team name on the ball as that of Instagram Account A. After locating this Pinterest account, additional public search engine queries were conducted, and a second Pinterest account was identified with a username consisting of a combination of SUBJECT USERNAME 1 and the PREVIOUS SUBJECT USERNAME.

53. Additionally, a Facebook account was identified with the vanity name “Louis Goodrich.” This Facebook account is currently following⁵ two other accounts, one of which is associated with the same professional baseball team as that of the password for the PREVIOUS SUBJECT USERNAME and as the profile photos on the Pinterest and Instagram accounts.

54. After law enforcement located the Facebook and Pinterest accounts social media accounts identified with the vanity name “Louis Goodrich,” the United States sought additional

⁵ Users of the Facebook social media platform can choose to publicly display interests, and or be served content from accounts associated with such interests, by “following” those accounts. For example, a Facebook user interested in the San Jose Sharks hockey team may choose “follow” the San Jose Sharks hockey team account to regularly see updates and posts by that account.

18 U.S.C. § 2703(d) orders for these accounts. On or about September 22, 2022, United States Magistrate Judge Richard A. Lloret, Eastern District of Pennsylvania, issued the orders for the Facebook and Pinterest accounts.

55. On or about October 5, 2022, Pinterest provided the following information associated with two accounts:

Username: PREVIOUS SUBJECT USERNAME (hereinafter referred to as “Pinterest Account A”)

Email: [PREVIOUS SUBJECT USERNAME]@gmail.com

Created: 2016/04/14 05:14:16

Username: Combination of SUBJECT USERNAME 1 and PREVIOUS SUBJECT USERNAME (hereinafter referred to as “Pinterest Account B”)

Email: [Combination of SUBJECT USERNAME 1 and PREVIOUS SUBJECT USERNAME@icloud.com]

Registration Date: 2021/12/13 14:22:06

As part of the Pinterest return for Pinterest Account B, Pinterest provided IP address 73.12.236.49, as an IP address that was accessed by the user account. On or about October 11, 2022, a Department of Homeland Security Summons was issued to Comcast for information regarding IP address 73.12.326.49, that was accessed on multiple occasions between December 13, 2021, and May 3, 2022. On November 23, 2022, Comcast responded to the summons and provided the following information regarding IP address 73.12.236.49, accessed by Pinterest Account 2. The subscriber’s name was STARBUCKS-S05883 STARBUCKS with a service address of 1501 16TH St. Unit 221, Sacramento, CA 95814-6072. This is the address of “The Fremont Building,” which is the apartment complex with units located above Starbucks. This is

the same Starbucks coffee house with a listed address of 1601 P Street, The Fremont Bldg., Sacramento, CA 95814, where law enforcement agents observed MENDONSA using electronic devices on multiple dates.

56. On or about October 14, 2022, Facebook provided the following information associated with the Facebook account of Louis Goodrich:

User ID: 100069446637159

Registered Email: [Combination of SUBJECT USERNAME 1 and PREVIOUS SUBJECT USERNAME]@icloud.com

Registration Date: 2021-06-23 06:29:43 UTC

Facebook also provided IP address history and identifying information about the Internet web browser and operating system the user appears to be utilizing to log into the account. A review of the provided information revealed the user appears to be using the Mozilla Firefox 5.0 web browser and utilizing a MacIntosh, Intel Mac OS X 10.15.

57. Law enforcement continued to conduct additional searches for the PREVIOUS SUBJECT USERNAME. In doing so, law enforcement located a CyberTipline report prepared by the National Center for Missing and Exploited Children⁶ (“NCMEC”) associated with the Facebook account “Louis Goodrich” with user ID 100009896286623. On April 15, 2018, NCMEC received CyberTipline Report 30815114 filed by Facebook. Facebook stated that the Louis Goodrich account with user ID 100009896286623 uploaded two images of clothed minors that were classified as “apparent child pornography (unconfirmed)” on February 4, 2018. The email address associated with the reported Facebook account was [PREVIOUS SUBJECT

⁶ NCMEC receives complaints via their CyberTipline from Internet Service Providers, Electronic Service Providers, and others. NCMEC creates reports and forwards the reports to law enforcement for further investigation.

USERNAME]@gmail.com. Facebook reported that the e-mail address had been verified. I know based on my training and experience that a verified email address indicates the user provided a valid email address and confirmed access to the email account.

58. After locating the e-mail address [PREVIOUS SUBJECT USERNAME]@gmail.com, further public search engine queries were conducted for accounts linked to that email address. A PayPal account was identified and linked to that same [PREVIOUS SUBJECT USERNAME]@gmail.com email address. After determining the linked PayPal account, additional searches on PayPal were conducted for the PREVIOUS SUBJECT USERNAME. A second PayPal account was identified as being registered to [PREVIOUS SUBJECT USERNAME]@yahoo.com.

59. After identifying both PayPal accounts, the United States sought orders pursuant to 18 U.S.C. § 2703(d) for information regarding both accounts. On or about September 22, 2022, United States Magistrate Judge Richard A. Lloret, Eastern District of Pennsylvania, issued an order for both PayPal accounts. On or about September 28, 2022, PayPal provided a consolidated response to the order and provided the following information:

Name: Louis MENDONSA

Email Addresses: louis@calgoldenbears.com (Confirmed), [PREVIOUS SUBJECT USERNAME]@gmail.com⁷(Confirmed)

Account #: 1192664714789424889

Time Created: Sat, 07 May 2016 05:39:17

Phone Numbers: 9163084285 (Confirmed), 9169952813

Addresses: 2022 10th Street, Sacramento, CA 95818 and 609 16th Street D, Sacramento, CA 95814.

60. On or about October 2022, a search of records held by the California Department of Motor Vehicle Licensing for MENDONSA revealed the following information:

NAME: LOUIS DONALD MENDONSA

ADDRESS: 2022 10th ST, SACRAMENTO, CA 95818

SEX: M

HGT: 600

WGT: 240

HAIR: GRY

EYES: BLU

[AGENT'S NOTE: A search of law enforcement databases revealed that MENDONSA does not appear to have ever been associated with the above-noted address.]

61. In or about October 2022, I obtained Sacramento County Department of Human Assistance Benefits Electronic Benefit Transfer (“EBT”) transaction records for MENDONSA. According to the records, MENDONSA is homeless and has no cell phone. Reviewing the transactions, I noted that a majority of the EBT transactions were conducted at Peace Market located at 1801 O St, Sacramento, CA 95811. Additionally, there were a few transactions at the Safeway located at 1814 19th St, Sacramento, CA 95811.

62. On November 2, 2022, law enforcement conducted surveillance at the Peace Market and Safeway from which MENDONSA previously purchased items. At approximately 4:25 p.m., law enforcement observed a Caucasian male matching the likeness and appearance of MENDONSA walk into Peace Market. MENDONSA was wearing what appeared to be gray sweatpants, white Nike shoes, and a black and orange hat. On November 3, 2022, I reviewed

MENDONSA's EBT records and confirmed that MENDONSA utilized a welfare card to purchase items from Peace Market on November 2, 2022, at 4:26 p.m.

63. On November 4, 2022, I conducted surveillance in the vicinity of Peace Market, where MENDONSA was seen on November 2, 2022. At approximately 10:40 a.m., I saw an individual matching the likeness and appearance of MENDONSA smoking outside of the Starbucks located at 1601 P St, Sacramento, CA.⁸ MENDONSA was using a tablet which appeared to be an iPad. At approximately 10:50 a.m., MENDONSA was sitting in the Starbucks at a table utilizing a MacBook Pro laptop. Approximately thirty minutes later, I learned from a CEOS investigative analyst who was currently on Websites A and C and that SUBJECT USERNAMES 1 and 3 were then active on Websites A and C. At the same time, I saw that MENDONSA was using his laptop at the Starbucks, as shown below:

⁸ This Starbucks location matched the IP address for the Pinterest account, referenced above.



64. Law enforcement continued conducting surveillance at the same Starbucks location. Between November 6, 2022, and November 18, 2022, with the exception of November 15, 2022, MENDONSA was seen occupying the same back corner table at the Starbucks at approximately 6:00 a.m. nearly every day. On November 4, 2022, I saw MENDONSA at the Starbucks and communicated with an investigative analyst who was currently on Website C. The investigative analyst told me that the SUBJECT USER was online and active on Website C near and around the same times that I saw him on his laptop in Starbucks.

65. Similarly, on November 9, 2022, an investigative analyst who was currently on Website D told me the SUBJECT USER was online status and activity on Website D near and around the same time he was observed on his laptop in Starbucks.

66. Based in part on the foregoing, the Honorable Alison Claire authorized a search warrant for the person of MENDONSA, his belongings located in the Starbucks, and for the porch of the residence where MENDONSA was storing his belongings during the day. On

November 29, 2022, around 7:45 a.m. to 8:00 a.m., law enforcement was located at the Starbucks in preparation to execute the search warrant. At that time, law enforcement observed MENDONSA inside the Starbucks location on his laptop computer. At the same time, a forensic analyst was logged on to Websites B, C, and D and observed the accounts associated with MENDONSA posting to Websites C and D. Around 8:10 a.m., MENDONSA stepped outside of the Starbucks, leaving his laptop computer up and running at the table located inside. Law enforcement made contact with MENDONSA and at around the same time law enforcement executed the search warrant on MENDONSA's laptop computer inside the Starbucks. Law enforcement observed that MENDONSA's computer was running the Tor browser, had tabs open where he was logged into Websites B, C, and D as SUBJECT USER 2, 3, and 4. MENDONSA briefly spoke to law enforcement and then requested an attorney. At approximately 8:15 a.m., law enforcement officers arrested MENDONSA on a Criminal Complaint charging MENDONSA with distribution of material involving the sexual exploitation of minors, in violation of 18 U.S.C. § 2252(a)(2) (case no. 2:22-mj-161-AC) and arrest warrant issued by the Honorable Allison Claire. I now seek this warrant in order to remotely search the SUBJECT ACCOUNTS.

THE REMOTE SEARCH TECHNIQUE

67. Based on my training, experience, and the investigation described above, I have concluded that using a remote search technique may help law enforcement locate evidence, instrumentalities, contraband, and fruits of the above-described crimes. Accordingly, I request authority to use the remote search technique to investigate the SUBJECT ACCOUNTS.

68. The remote search of the account will entail an HSI agent logging into the SUBJECT ACCOUNTS on Websites A, B, C, and D and documenting each account profile, information about the SUBJECT USER, messages and files sent to and from others (including

private messages sent one-on-one between the SUBJECT USER and other members of each website), and other information that is accessible by logging into the SUBJECT ACCOUNTS. HSI will save the webpages as individual files and/or take screenshots of the specific pages. HSI will not make any changes to the account and will not take any actions to impersonate the SUBJECT USER.

69. Each of the categories of information described in Attachment B may constitute evidence of the crimes under investigation and may provide further information that could be used to determine the full nature and scope of MENDONSA's criminal activities, as well as the identity and location of other users of the SUBJECT WEBSITES and the nature and scope of their criminal activities.

JURISDICTION

70. This Court has jurisdiction to issue the requested warrant under Rule 41(b)(6)(A) because the above facts establish there is probable cause to believe that the district where the information is located has been concealed through technological means and that there is probable cause to believe that activities related to the crime being investigated occurred within this judicial district. Specifically, HSI agents located in the Eastern District of California accessed Websites A, B, C, and D; viewed posts and advertisements that the SUBJECT USER posted to Websites A, B, C, and D; and located child pornography files that the SUBJECT USER made available through Website A into the Eastern District of California. The proposed remote search of the SUBJECT ACCOUNTS will also be conducted by law enforcement agents located in the Eastern District of California.

REQUEST FOR SEALING

71. It is respectfully requested that this Court issue an order sealing, until further order of the Court, all papers submitted in support of this application, including the application

and search warrant. I believe that sealing this document is necessary because the search warrant is relevant to an ongoing investigation into Website A, B, C, and D's users, and not all of the targets of this investigation will be searched at this time. Based upon my training and experience, I have learned that online criminals actively search for criminal affidavits and search warrants via the internet, and disseminate them to other online criminals as they deem appropriate. For example, law enforcement agents have seen court documents posted online on Tor hidden services dedicated to child pornography. Premature disclosure of the contents of this affidavit and related documents may have a significant and negative impact on the continuing investigation and may severely jeopardize its effectiveness.

Respectfully submitted,

/s/ Caitlin Thomas

Caitlin Thomas
Special Agent
Homeland Security Investigations

Subscribed and sworn to me telephonically
on November 29, 2022:


ALLISON CLAIRE
UNITED STATES MAGISTRATE JUDGE

Approved as to form by:


AUSA Emily G. Sauvageau

ATTACHMENT A – 1

1. This warrant authorizes the use of a remote search technique to be deployed on the computer server hosting “Website A,” in an effort to obtain information described in Attachment B from the account described below.

2. The computer server is the server operating the Tor network website, Website A, as identified by the following Tor URL:

<http://243vnzoix3ct6vowjgakv3pdqrzfnkoz5plwgta3ar2onqobzhz5jid.onion/>

The current location of this server is concealed through technological means.

3. SUBJECT ACCOUNT 1—*i.e.*, the Website A account used by the SUBJECT USER—is described by the Website A username “JediFox.”

ATTACHMENT A - 2

1. This warrant authorizes the use of a remote search technique to be deployed on the computer server hosting “Website B,” in an effort to obtain information described in Attachment B from the account described below.

2. The computer server is the server operating the Tor network website referred to as Website B, as identified by the following Tor URL:

<http://boysrusx2x57nrer4xll4ap6ityf5qskjzewhnz7s6qto3mjjzegreteid.onion/>

The current location of this server is concealed through technological means.

3. SUBJECT ACCOUNT 2—*i.e.*, the Website B account used by the SUBJECT USER—is described by the Website B username “Yoda.”

ATTACHMENT A - 3

1. This warrant authorizes the use of a remote search technique to be deployed on the computer server hosting “Website C,” in an effort to obtain information described in Attachment B from the account described below.

2. The computer server is the server operating the Tor network website referred to as Website C, as identified by the following Tor URL:

<http://bv6x2v64lqj7cxxwiuh5xvwikv7zwvpgq7dwei26p7v4xbaag5ewexad.onion/>

The current location of this server is concealed through technological means.

3. SUBJECT ACCOUNT 3—*i.e.*, the Website C account used by the SUBJECT USER—is described by the Website C username “Darth Vader.”

ATTACHMENT A - 4

1. This warrant authorizes the use of a remote search technique to be deployed on the computer server hosting “Website D,” in an effort to obtain information described in Attachment B from the account described below.

2. The computer server is the server operating the Tor network website referred to as Website D, as identified by the following Tor URL:

<http://forbidn7733ri3ro6zp4tqm4wurhsj7cnhifjzkem25mi6qyimyfy6qd.onion>

The current location of this server is concealed through technological means.

3. SUBJECT ACCOUNT 4—*i.e.*, the Website D account used by the SUBJECT USER—is described by the Website D username “Gunslinger.”

ATTACHMENT B

Items to Be Seized

All information described in Attachment A that constitutes fruits, evidence, contraband, and instrumentalities of violations 18 U.S.C. §§ 2251(d) and (e) (advertisement of child pornography), 2252(a) and (b) (distribution, transportation, receipt, possession, and access with intent to view child pornography), and attempts and conspiracies to commit those offenses, involving the user(s) of the SUBJECT ACCOUNTS on Websites A, B, C, and D since January 1, 2021, including, for the SUBJECT ACCOUNTS, information pertaining to the following matters:

- (a) The identity of the person(s) who created, owned, controlled, or used the SUBJECT ACCOUNTS, including information that could help reveal the whereabouts of such person(s).
- (b) Child pornography and child erotica sent by, received by, or accessible through the SUBJECT ACCOUNTS.
- (c) Any information relating to the production, advertisement, distribution, transportation, access with intent to view, or possession of child pornography or child erotica by any person.
- (d) All communications sent by, received by, or accessible through the SUBJECT ACCOUNTS as they relate to violations of the statutes described above, sexual activity with minors, or the identity or location of any minors depicted in child pornography or child erotica.
- (e) Any information relating to the identity or location of any participant in the communications described in the previous paragraph.

(f) Any information relating to the identity or location of any minor depicted in child pornography or child erotica accessible through the SUBJECT ACCOUNTS or Websites A, B, C, and D.

This warrant does not authorize the physical seizure of any tangible property. In approving this warrant, the Court finds reasonable necessity for the seizure of stored wire and electronic information as described above. *See* 18 U.S.C. § 3103a(b)(2).

UNITED STATES DISTRICT COURT

for the

Eastern District of California

Case No.

2:22-sw-0871 AC

SEALED

WARRANT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

To: Any authorized law enforcement officer

An application by a federal law enforcement officer or an attorney for the government requests the search and seizure of the following person or property located in the Eastern District of California
(identify the person or describe the property to be searched and give its location):

SEE ATTACHMENT A, attached hereto and incorporated by reference.

I find that the affidavit(s), or any recorded testimony, establish probable cause to search and seize the person or property described above, and that such search will reveal (*identify the person or describe the property to be seized*):

SEE ATTACHMENT B, attached hereto and incorporated by reference.

YOU ARE COMMANDED to execute this warrant on or before *(not to exceed 14 days)*

in the daytime 6:00 a.m. to 10:00 p.m. at any time in the day or night because good cause has been established.

Unless delayed notice is authorized below, you must give a copy of the warrant and a receipt for the property taken to the person from whom, or from whose premises, the property was taken, or leave the copy and receipt at the place where the property was taken.

The officer executing this warrant, or an officer present during the execution of the warrant, must prepare an inventory as required by law and promptly return this warrant and inventory to: any authorized U.S. Magistrate Judge in the Eastern District of California.

Pursuant to 18 U.S.C. § 3103a(b), I find that immediate notification may have an adverse result listed in 18 U.S.C. § 2705 (except for delay of trial), and authorize the officer executing this warrant to delay notice to the person who, or whose property, will be searched or seized (*check the appropriate box*)

for 30 days (*not to exceed 30*) until, the facts justifying, the later specific date of .

Date and time issued: November 29, 2022 @ 10:32 a.m.

City and state: Sacramento, California

Allison Claire
ALLISON CLAIRE
UNITED STATES MAGISTRATE JUDGE

Return

Case No.:	Date and time warrant executed:	Copy of warrant and inventory left with:
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Inventory made in the presence of :

Inventory of the property taken and name of any person(s) seized:

Certification

I swear that this inventory is a true and detailed account of the person or property taken by me on the warrant.

Subscribed, sworn to, and returned before me this date.

Signature of Judge

Date